

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LAWRENCE E. JAFFE PENSION PLAN, On )	Lead Case No. 02-C-5893
Behalf of Itself and All Others Similarly )	(Consolidated)
Situated, )	
	) <u>CLASS ACTION</u>
Plaintiff, )	
	) Judge Ronald A. Guzman
vs. )	Magistrate Judge Nan R. Nolan
	)
HOUSEHOLD INTERNATIONAL, INC., et )	
al., )	
	)
Defendants. )	
_____ )	

**DECLARATION OF D. CAMERON BAKER IN SUPPORT OF THE CLASS' MOTION  
TO COMPEL PRODUCTION OF DISCOVERY AND ISSUANCE OF LETTERS OF  
REQUEST UNDER THE HAGUE CONVENTION**

I, D. CAMERON BAKER, declare as follows:

1. I am an attorney duly licensed to practice before all of the courts of the State of California, New York and am admitted to the General Bar of the United States District Court in the Northern District of Illinois. I am of counsel at the law firm of Lerach Coughlin Stoia Geller Rudman & Robbins LLP, lead counsel for plaintiffs and the Class in the above-entitled action. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. Attached are true and correct copies of the following exhibits:

- Exhibit 1: Stipulation and Order Providing for Household International, Inc. to Preserve and Maintain Relevant Documents entered on April 8, 2003;
- Exhibit 2: Letter dated August 8, 2006 from Arwen Handley, Esq. to D. Cameron Baker, Esq.;
- Exhibit 3: Letter dated August 8, 2006 from Craig Kesch, Esq. to D. Cameron Baker, Esq.;
- Exhibit 4: Email dated August 18, 2006 from Riche McKnight, Esq. to D. Cameron Baker, Esq.;
- Exhibit 5: Letter dated July 25, 2006 from D. Cameron Baker, Esq. to Thomas J. Kavalier, Esq.;
- Exhibit 6: Press Release dated November 14, 2002 entitled "HSBC TO ACQUIRE HOUSEHOLD INTERNATIONAL," which was filed with the Securities and Exchange Commission ("SEC") on November 14, 2002, and downloaded and printed from the SEC's website at <http://www.sec.gov>;
- Exhibit 7: Excerpts from Household International, Inc.'s ("Household") Proxy Statement filed by Household with the SEC on February 26, 2006, which was downloaded and printed from the SEC's website;
- Exhibit 8: Household International Inc. Conference Call Transcript regarding Goldman Sachs Roadshow Meeting for Household International HSBC, dated November 14, 2002;
- Exhibit 9: Excerpts from a Form 8-K filed by Household with the SEC on March 28, 2003, which was downloaded and printed from the SEC's website;

- Exhibit 10: Stock Chart Price representing the value of Household common stock as traded on the New York Stock Exchange during the relevant period, the chart was prepared by Lead Plaintiffs;
- Exhibit 11: Excerpts from the November 14, 2002 Merger Agreement between Household and HSBC Holdings plc, filed as an attachment to Household's Proxy Statement filed by Household with the SEC on February 26, 2006, which was downloaded and printed from the SEC's website;
- Exhibit 12: Notice of Videotaped deposition and Request for Production of Documents of Non-Party Morgan Stanley & Co., Inc.;
- Exhibit 13: Email dated July 19, 2006 from Riche McKnight, Esq. to D. Cameron Baker, Esq.;
- Exhibit 14: Letter dated July 25, 2006 from D. Cameron Baker, Esq. to Arwen Handley, Esq.;
- Exhibit 15: Letter dated August 8, 2006 from D. Cameron Baker, Esq. to Craig Kesch, Esq.;
- Exhibit 16: Letter dated August 10, 2006 from Craig Kesch, Esq. to D. Cameron Baker, Esq.;
- Exhibit 17: Excerpts from the Household 2005 Form 10-K filed by Household with the SEC on March 6, 2006, which was downloaded and printed from the SEC's website;
- Exhibit 18: Excerpts from the HSBC 2005 Form 20-F filed by HSBC with the SEC on March 20, 2006, which was downloaded and printed from the SEC's website;
- Exhibit 19: Excerpts from the HSBC 2004 Annual Report and Accounts, which was downloaded and printed from the HSBC's website at [http://www.ukpersonal.hsbc.co.uk/hsbc/fin\\_reps/2004-results](http://www.ukpersonal.hsbc.co.uk/hsbc/fin_reps/2004-results); and
- Exhibit 20: HHS 03281523 - HHS 03281537.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 21st day of September, 2006, at San Francisco, California.

s/D. Cameron Baker  
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D. CAMERON BAKER